BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION TO ACCEPT LATE FILED INTERROGATORY RESPONSES

Pitney Bowes is today filing the Responses of Pitney Bowes Inc. Witness Martin to Interrogatories of United States Postal Service (USPS/PB-T1-1-5 and USPS/PB-T2-4, 5, 16(a), USPS/PB-T3-11) (Referred). The filing is two days out of time, owing to Ms. Martin's unavailability because of her travel schedule. We submit that the Postal Service will not be prejudiced by this brief delay and ask that the interrogatory responses be accepted for filing.

Respectfully submitted,

lan D. Volner

N. Frank Wiggins

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Suite 1000

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Counsel for Pitney Bowes Inc.

Dated: July 3, 2000

CERTIFICATION

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding having requested service of discovery documents in accordance with Section 12 of the rules of practice.

N. Frank Wiggins